

EXHIBIT 2

Nathaniel H. Robin, M.D.

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF ILLINOIS

3
4 CIVIL ACTION NO. 17-CV-793-MJR-SCW

5
6 IN RE: DEPAKOTE CASES

7 A.S. by MARTHEE SANSONE, ET AL.,
8 Plaintiff,

9 vs.

10 ABBOTT LABORATORIES, INC.,
11 Defendant.

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13
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15 DEPOSITION

16 OF

17 NATHANIEL H. ROBIN, M.D.

18 December 8, 2017

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23 REPORTED BY: Heather Spier

24 Certified Court Reporter,
25 and Notary Public

1 is a little trickier. I'm not --
2 Asperger's doesn't necessarily mean a
3 learning disability. It could just be a
4 personality issues.

5 Q. We can agree that autism and
6 ADHD are learning disabilities?

7 A. Yes.

8 Q. You say in your report in
9 Paragraph 3.1 on Page 4, Doctor, that
10 A.S. 's older brother was delivered as a
11 healthy baby boy and has no malformations
12 or learning disabilities.

13 A. Yes. That was based on the
14 records I reviewed. And I subsequently
15 learned through Dr. Braddock's -- and I
16 asked about that, that he commented that
17 the child had -- the sibling had
18 Asperger's. So I asked about that, and
19 that was confirmed. That wasn't available
20 in the records I initially reviewed.

21 Q. Well, Marthee Sansone in her
22 deposition said that her older son has
23 Asperger's, autism and ADHD --

24 A. And I must have missed it.

25 Q. So that's a factual error in

1 your report?

2 A. Factual error.

3 Q. A.S. 's older brother also
4 has special education and individualized
5 educational program as well, right?

6 A. Yes.

7 Q. Both of which would indicate a
8 learning disability?

9 A. Yes.

10 Q. Does a sibling having a
11 learning disability have any relevance to
12 your opinions regarding causation of any
13 learning disabilities that A.S. may
14 have?

15 A. So there are several
16 possibilities. One is that they do share
17 a genetic issue. Second, they could be
18 exposed to same environmental agent. In
19 this case I was told they were supposed to
20 valproic acid.

21 Q. You make a point of showing
22 that the dosage was 500 milligrams per day
23 for the older brother, right?

24 A. Yes.

25 Q. And I presume you made that

1 point because that was less than A.S.
2 was exposed to?

3 MS. WILLIAMSON: Object to the
4 form.

5 A. I don't recall.

6 Q. Do you intend to be offering
7 any opinions at trial about dose response
8 and valproic acid embryopathy?

9 A. No.

10 Q. You acknowledge in your report
11 that Ms. Sansone smoked a pack of
12 cigarettes per day during her pregnancy
13 with A.S. ?

14 A. Yes.

15 Q. You read her deposition?

16 A. Yes. I don't recall every
17 detail, but I remember she said she
18 smoked.

19 Q. Do you remember she actually
20 disputed a medical record that said she
21 was smoking a pack per day?

22 A. I remember something about
23 that, yeah.

24 Q. Did you happen to see any
25 medical records that, in fact, confirmed

Nathaniel H. Robin, M.D.

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C E R T I F I C A T E

STATE OF ALABAMA
MADISON COUNTY

I hereby certify that the
above and foregoing deposition was taken
down by me in stenotypy, and the questions
and answers thereto were reduced to
typewriting under my supervision, and that
the foregoing represents a true and
correct transcript of the deposition given
by said witness upon said hearing.

I further certify that I am
neither of counsel nor of kin to the
parties to the action, nor am I in anywise
interested in the result of said cause.

Heather Spier
COMMISSIONER-NOTARY PUBLIC
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